

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ELIZABETH DE COSTER *et al.*, on behalf
of themselves and all others similarly situated,

Plaintiffs,

v.

AMAZON.COM, INC., a Delaware
corporation,

Defendant.

Case No. 2:21-cv-00693-JHC

**STIPULATED MOTION AND ORDER
TO EXTEND THE BRIEFING
SCHEDULE FOR PLAINTIFFS'
MOTION TO COMPEL**

DEBORAH FRAME-WILSON *et al.*, on
behalf of themselves and all others similarly
situated,

Plaintiffs,

v.

AMAZON.COM, INC., a Delaware
corporation,

Defendant.

Case No. 2:20-cv-00424-JHC

Case No. 2:22-cv-00965-JHC

CHRISTOPHER BROWN, *et al.*, on behalf
of themselves and all others similarly situated,

Plaintiffs,

v.

AMAZON.COM, INC., a Delaware
corporation,

Defendant.

STIPULATED MOTION

Pursuant to Local Civil Rules 7(d)(1) and 10(g), the parties stipulate and agree to extend the briefing schedule on Plaintiffs' motion to compel, subject to the Court's approval.

1. On August 29, 2024, Plaintiffs filed their motion to compel the production of documents from Amazon's privilege logs and for the appointment of a special master. ECF Nos. 189 (2:21-cv-00693-JHC), 186 (2:20-cv-00424-JHC), and 89 (2:22-cv-00965-JHC).

2. On August 30, 2024, Plaintiffs agreed to provide Amazon a two-week extension for its opposition brief, and Amazon agreed to provide Plaintiffs a one-week extension for their reply brief.

3. These extensions are necessary to afford time to fully and effectively brief the issues raised in Plaintiffs' motion, in light of conflicting obligations of counsel and the nature of the issues raised. The extensions will not alter any other dates or case schedules previously set by the Court.

4. Counsel therefore stipulate, subject to the Court's approval, that Amazon shall file its opposition by Friday, September 27, 2024; Plaintiffs shall file their reply by Thursday, October 10, 2024; and Plaintiffs' motion to compel shall be re-noted for consideration on Thursday, October 10, 2024.

IT IS SO STIPULATED.

DATED this 5th day of September, 2024.

DAVIS WRIGHT TREMAINE LLP

By: /s/ John A. Goldmark

John A. Goldmark, WSBA #40980
MaryAnn Almeida, WSBA #49086
920 Fifth Avenue, Suite 3300
Seattle, WA 98104-1610
Telephone: (206) 622-3150
Email: JohnGoldmark@dwt.com
Email: MaryAnnAlmeida@dwt.com

PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP

Karen L. Dunn (*pro hac vice*)
William A. Isaacson (*pro hac vice*)
Amy J. Mauser (*pro hac vice*)
Martha L. Goodman (*pro hac vice*)
Kyle Smith (*pro hac vice*)
2001 K Street, NW
Washington, D.C. 20006-1047
Telephone: (202) 223-7300
Email: kdunn@paulweiss.com
Email: wisaacson@paulweiss.com
Email: amauser@paulweiss.com
Email: mgoodman@paulweiss.com
Email: ksmith@paulweiss.com

Attorneys for Defendant Amazon.com, Inc.

HAGENS BERMAN SOBOL SHAPIRO LLP

By: /s/ Steve W. Berman
Steve W. Berman (WSBA No. 12536)
Barbara A. Mahoney (WSBA No. 31845)
1301 Second Avenue, Suite 2000
Seattle, WA 98101
Telephone: (206) 623-7292
E-mail: steve@hbsslaw.com
E-mail: barbaram@hbsslaw.com

Anne F. Johnson (*pro hac vice*)
68 3rd Street, Suite 249
Brooklyn, NY 11231
Telephone: (718) 916-3520
E-mail: annej@hbsslaw.com
KELLER POSTMAN LLC

Zina G. Bash (*pro hac vice*)
111 Congress Avenue, Suite 500
Austin, TX, 78701
Telephone: (512) 690-0990
E-mail: zina.bash@kellerpostman.com

Jessica Beringer (*pro hac vice*)
Shane Kelly (*pro hac vice*)
150 North Riverside Plaza, Suite 4100

Chicago, Illinois 60606
Telephone: (312) 741-5220
E-mail: Jessica.Beringer@kellerpostman.com
E-mail: shane.kelly@kellerpostman.com

*Interim Co-Lead Counsel for Plaintiffs and the
proposed Class*

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

By: /s/ Alicia Cobb

Alicia Cobb, WSBA # 48685
1109 First Avenue, Suite 210
Seattle, WA 98101
Telephone: (206) 905-7000
Email: aliciacobb@quinnemanuel.com

Steig D. Olson (*pro hac vice*)
David D. LeRay (*pro hac vice*)
Nic V. Siebert (*pro hac vice*)
Maxwell P. Deabler-Meadows (*pro hac vice*)
51 Madison Avenue, 22nd Floor
New York, NY 10010
Telephone: (212) 849-7000
Email: steigolson@quinnemanuel.com
Email: davidleray@quinnemanuel.com
Email: nicolassiebert@quinnemanuel.com
Email: maxmeadows@quinnemanuel.com

Adam B. Wolfson (*pro hac vice*)
865 South Figueroa Street, 10th Floor
Los Angeles, CA 90017-2543
Telephone: (213) 443-3000
Email: adamwolfson@quinnemanuel.com

*Interim Executive Committee for Plaintiffs and the
proposed Class*

ORDER

The Court GRANTS the Parties' stipulated motion. Amazon shall file its opposition to Plaintiffs' Motion to Compel Production of Documents from Amazon's Privilege Logs and for Appointment of Special Master by Friday, September 27, 2024; Plaintiffs shall file their reply by Thursday, October 10, 2024. The Court DIRECTS the Clerk to re-note Plaintiffs' motion for consideration on Thursday, October 10, 2024.

IT IS SO ORDERED this 5th day of September, 2024.



John H. Chun

UNITED STATES DISTRICT JUDGE